



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D. C. 20580

Office of the Secretary

August 8, 1997

Mr. Charles M. Supple
Chief, Dealer Section
Division of Motor Vehicles
Wisconsin Department of Transportation
4802 Sheboygan Avenue
Madison, Wisconsin 53707-7909

Dear Mr. Supple:

This responds to your letter of April 2, 1997, notifying the Commission, pursuant to the terms of an Exemption¹ from the Commission's "Used Car Rule" ("the Rule"),² granted by the Commission to the State of Wisconsin, of certain changes in State regulations affecting disclosures by used car dealers. The 1986 Exemption requires such notification to enable the Commission to ascertain whether the changes will have a significant adverse effect on the overall level of protection afforded consumers under State law in comparison to that provided by the Rule, or on the effectiveness of administration and enforcement of State requirements. Your letter seeks continuation of the 1986 Exemption from the Rule.

The amendments reported in your letter incorporate a number of changes to the Disclosure Label required to be displayed on used cars being offered for sale. The Disclosure Label was the basis for the Commission's decision to grant the 1986 Exemption. The Exemption permits Wisconsin to require used car dealers to use the State Disclosure Label in place of the Buyers Guide required by the Rule. The Commission has reviewed the revisions to the Wisconsin Disclosure Label and has decided that the revised form affords an overall level of protection to Wisconsin consumers that is as great as or greater than that afforded by the Rule. The Commission also believes that the Wisconsin Department of Transportation continues to administer and enforce its regulation effectively.

Based on the information submitted with your letter and other materials submitted in connection with your request, the Commission has decided that the public interest does not require that the Exemption be revised, modified or revoked. Instead, the Commission has decided to grant a continuation of the Exemption under the same terms as those stated in the Federal Register notice initially announcing the Exemption in 1986.

By direction of the Commission.

Donald S. Clark
Secretary

¹ 51 Fed. Reg. 20936 (June 9, 1986).

² Trade Regulation Rule Concerning the Sale of Used Motor Vehicles, 16 C.F.R. Part 455.